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To: Lon_Kissinger/R10/USEPA/US%EPA@aa.ad.epa.gov
Cc: craig.mccormack@ecy.wa.gov; dbra461@ecy.wa.gov; [Martha Hankins](#)
Subject: Re: Salmon and the EPA Framework in the Ecology Response to Comments on the Ecology TSD
Date: Tuesday, September 18, 2012 3:10:03 PM

I'm just going to add a bit to Lon's comment, as the salmon decision for the Framework was considerably agonizing and I would like to add some more detail.

There wasn't a scientific determination that the PCB body burden of salmon caught in the Duwamish Waterway was not related to releases from sites that do or did release PCBs to the Duwamish. Rather, there was a policy determination to assume that the body burden was due entirely to releases at remote locations.

I did not agree with this decision, for reasons that are iterated in the uncertainty section of the Framework, because there are many ways that releases of PCBs and other bioaccumulative chemicals can become transported to remote locations and taken up by salmon before they return to the river, but there did not seem to be any way to scientifically parse percentages of body burden due to local or remote sources of release of the contamination that ends up in the salmon tissue. Therefore, it seemed we needed to assume 0 percent or 100 percent as a policy matter, as anything in between would essentially be arbitrary. So....the policy decision made was to assume zero percent that is due to releases from sites along or close to the Duwamish Waterway.

I like to think that this issue is still up for consideration as we learn more about transportation of bioaccumulative contaminants through various biological, meteorological and mechanical processes that take place in the Waterway. In the meantime, I think the debate regarding 0 percent vs. 100% is also viable (for Ecology if not for Region 10.)

Marcia

-----Lon Kissinger/R10/USEPA/US wrote: -----

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From: Lon Kissinger/R10/USEPA/US
Date: 09/18/2012 02:04PM
Cc: Marcia Bailey/R10/USEPA/US@EPA
Subject: Salmon and the EPA Framework in the Ecology Response to Comments on the Ecology TSD

Hi,

Page 42: It should be noted that in the Framework, that salmon are included, but that the issue is whether or not for a particular contaminant, the body burden is site related. For the Lower Duwamish, the PCB salmon body burden was determined not to be site related, and the PCB dose associated with salmon consumption was not included in the assessment of site risks.

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